



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

MARTA MCCLANAHAN (fka MARTA)
STINSON) & JESSICA STINSON)
)
Plaintiffs,)
)
v.) Civil Case No. 3:19-cv-163
) Chief Judge Crenshaw/Frensley
)
MEDICREDIT, INC.)
)
Defendant.)

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs Marta McClanahan (McClanahan) and Jessica Stinson (Stinson) (collectively "Plaintiffs"), by and through counsel, and respectfully requests leave from the Court to file under seal the following documents, each being of which is being filed contemporaneously as a "Sealed Document" pursuant to Administrative Order No. 167, Section 5.07.

- 1) Conditions of Admission and Consent to Outpatient Care dated and signed by Marta McClanahan dated 11/26/2016.
- 2) Blue Cross Blue Shield of Tennessee Insurance Card of Marta M. Stinson (McClanahan).
- 3) Medical Statement from The Frist Clinic for Marta M. Stinson (McClanahan) dated 7/17/2018.
- 4) Medical Statement from Centennial Medical Center for Marta M. Stinson (McClanahan) dated 11/26/2016.

Plaintiffs McClanahan and Stinson request that the following documents be filed under

seal for the following reason:

- 1) The above medical documents contain sensitive private medical information which the Plaintiff McClanahan wishes to keep private.
- 2) Such documents are referenced in Plaintiffs' Memorandum in Support of Partial Summary judgment having been produced through discovery.
- 3) Opposing Counsel in this matter has no objection to these medical records and bills being filed under seal.

WHEREFORE, Plaintiffs McClanahan and Stinson respectfully requests this Honorable Court grant Leave to File Under Seal.

April 21, 2020

Respectfully submitted,

**MARTA MCCLANAHAN
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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2020, a copy of PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated below. Parties may access this filing through the Court's electronic filing system.

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4/21/2020

s/ Brent S. Snyder
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